

1887-013 Chancery Causes: William M. Young vs. William D. Jones
Lee Co.

CA-Debt

T-Property

To The Hon. H. S. K. Morison
Judge of the Circuit Court of
Lee County Virginia:

Your orator William M. Young
who humbly complaining
would respectfully represent
that heretofore to wit, on or
about the 25th day of May
1887, your orator sold to one
Wm D. Jones a valuable
tract of land at the price of
\$10,000⁰⁰, a part of which
was paid him at the time,
and about \$2000.⁰⁰ of which
there is now judgement or decree
upon, in this Hon. Court on
the Chancery side thereof, against
said Jones and others. The
residue is evidenced by bonds,
one of which is for \$3000.⁰⁰
and is due & payable after
two years, and dated May 25th
1887; the other for a like sum
and dated on same day is
payable after three years and
each bears interest from
their date. There has not
any thing been paid on
either of these bonds, but

Your crator concedes that said Jones is entitled to one half the amount he the said Jones paid H. S. Kane and others to compromise three ejectment suits against your crator and others, which is according to said Jones statement to your crator \$600.⁰⁰ being half the amount paid. The residue is justly owing to your crator & will fall due at the times stated. These two bonds marked one & two will be found filed herewith as part hereof.

The said Jones is a non-resident of this Commonwealth but has estate, in land, in this County, of which he is the owner in fee. He owns the tract purchased of your crator situated in this County in what is known as the Wild Cat valley wherein your crator resides, the number of acres not known, and for a more particular description of which reference is here made to the deed to said Jones by your crator now of record in this

County.

He also cures a tract purchased from J. P. Kane in the same neighborhood, and for a particular description of which reference is here made to the said deed, and title papers of the said Jones - This tract is known as the Penellten tract and is the same whereon Dale W. Legg now resides -

He also cures a tract, purchased from Mr. E. Hyatt, on Penellten river, adjoining the Canal of L. C. Clinger and others, and for a particular description of which reference is here made to the deed & title papers of said Jones now of record in the Clerk's office of Lee County Virginia -

Your orator is informed, and believes that said Jones is now endeavoring to sell and mortgage or convey by deed of trust all his property in this County, so that there will not be left of his property sufficient to pay the same should the ordinary

process of law be used to
collect the same. He the said
Jones, is also the owner of an
other tract of land purchased from
Harvey Young and one R. A. Ayers
situated in this County consisting of
1000 acres purchased from G. W. Young
by them, situated on the South side of
Wallins Ridge and North side of Pow-
els mountain, on the waters of
Levelady Creek, adjoining the lands
of D. S. Litten and others, and for
a more particular description of
which reference is made to the
deed of G. W. Young to said Harvey
Young & Ayers now of record in
the clerks office of Lee County
Virginia - The said Jones owns
an other tract adjoining the last named
of 100 acres purchased from the
said Young (Harvey) and R. A. Ayers
and for a more particular descrip-
tion of which reference is here
made to said Jones deed and title
papers. Also an other tract, pur-
chased from said Harvey Young, and
R. A. Ayers consisting of 240 acres and
reference to which is here made to

said Jones deeds and title papers
now of record in the clerk's office
copies of which said deeds will
in due time be filed with this
bill, showing specifically the
meters and bounds thereof.

The object of this bill therefore is
to attach upon the lands in this bill
mentioned and hold the same for the
payment of the debt herein men-
tioned, and on a hearing to have
a decree rendered in favor of
your orator for the amount found
due him, and to have so much
of said land sold as will
pay and discharge the same.

The premises considered therefore
your orator prays that Wm D.
Jones be made a party defend-
ant to this bill, and answer the
same, but to do so on oath is
expressly waived by your orator
and that on a hearing, a decree be
rendered in favor of your orator
for the amt due him and that said
land or so much thereof be sold as will
pay or discharge the same - And for all
other further and general relief may
Supra issue &c.

A. L. Pickens
for plff.

Wm M. Young

r } Bill Chip

W. D. Jones et al

Virginia Lee County to wit.
This day w^m M. Young
personally appeared before
me the undersigned and
made oath that w^m D. Jones
is justly indebted to him
in the sum of six thousand
dollars ^{with interest from 25th May 1887} \$3000.00 which is
due and payable 25th day
of May 1889, and is due by
bond after two years, and
dated, May 25 1887. The
residue \$3000.00 will become
due and payable after
three years, for three thousand
dollars and dated May 25 1887
And these sums are justly
due and payable at the times
stated; and subject only
to a credit of only of
about \$600.00 in settlement
for compromise of the eject-
ment suit, by H. S. Kane et al
against affiant and others
in the Circuit Court of Lee
County, and which matter is
yet unsettled, and which af-
fiant believes does not ex-
ceed the said sum of six

hundred dollars. And affiant
further states that said Jones is
a non resident of the State of
Virginia and that he has estate
belonging to him in the County
of Lee, viz lands, and affiant
is informed and believes, that
said Jones is now endeavoring
to transfer by sale or deed of
trust said lands so that he
the said Jones will not prob-
ably have sufficient effects
in said State of Virginia to
pay the same should only the
ordinary process of law
be used to obtain said judg-
ment on said sum. So does
affiant as aforesaid.

J. A. Stogatt Clerk